

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RBG PLASTIC LLC)	
d/b/a Restaurantware,)	
an Illinois company,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	17-cv-6283
FIRST PACK LLC d/b/a)	
Pack N Wood, a New York)	
Company,)	
)	
Defendant.)	

MOTION FOR LEAVE TO FILE SEALED DOCUMENT

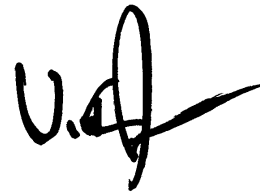
NOW COMES the Plaintiff, RBG PLASTIC LLC, d/b/a Restaurantware ("Restaurantware"), and for its Motion For Leave to File Sealed Document states as follows:

1. This case arises out of Defendant's breach of the December 7, 2016, settlement agreement ("Settlement Agreement") between the parties.
2. The Settlement Agreement contains confidential terms pertaining to the parties' respective business interests that the parties do not wish to publically disclose.
3. The confidential provisions of the Settlement Agreement deserve protection from public disclosure.
4. The confidential provisions of the Settlement Agreement are not publicly available and they have little to no public value. Their disclosure could cause undue burden or expense to either Party by foreseeably harming the parties' business interests.
5. The terms of the Settlement Agreement that are subject to the Settlement Agreement's provision on confidentiality are redacted in the filed Complaint in this matter.

6. Concurrently with filing the redacted Complaint, Plaintiff Restaurantware makes this motion seeking leave of the Court to file the un-redacted Complaint under seal.
7. Given that both Parties herein are the parties to the Settlement Agreement, and that the Court will be provided with an un-redacted version of the Complaint, no prejudice will result from the granting of this motion.

WHEREFORE, the Plaintiff, Restaurantware, requests this honorable Court grant this Motion and allow the Plaintiff to file the original Complaint under seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'V. Jayaram', with a long horizontal stroke extending to the right.

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